

# Office for Nuclear Regulation (ONR) Site Report for Trawsfynydd

Report for period 1 April 2021 to 30 September 2021

## Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members for the Trawsfynydd Site Stakeholder Group (SSG) and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Trawsfynydd SSG meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.



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# 1 Inspections

## Dates of inspection

Our inspectors made inspections on the following dates during the report period 1 April 2021 to 30 September 2021:

- 15 to 17 June 2021
- 6 July 2021
- 21 to 23 September 2021

# 2 Routine Matters

## Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013
- the Health and Safety at Work Act 1974 (HSWA74); and
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).
- Nuclear Industries Security Regulations (NISR) 2003 (as amended); and
- Regulatory Reform (Fire Safety) Order 2005.

The inspections entail monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety and security. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of Trawsfynydd covered the following:

- LC7 - Incidents on the site
- LC14 - Safety documentation
- LC15 - Periodic review
- LC16 - Site plans, designs and specifications
- LC17 - Management systems
- LC23 – Operating rules
- LC24 – Operating instructions
- LC25 – Operational records

During the reporting period, ONR judged the arrangements made and implemented by the site in response to safety and security requirements to be satisfactory in the areas inspected. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales. Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at [www.onr.org.uk/intervention-records](http://www.onr.org.uk/intervention-records) on our website [www.onr.org.uk](http://www.onr.org.uk). Should you have any queries regarding our inspection activities, please email [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

## Other work

Throughout this reporting period, including the period of national lockdown, ONR's nominated site safety inspector has held fortnightly telephone meetings with a Trawsfynydd leadership team representative to maintain situational awareness of matters related to nuclear safety, security, safeguards, transport, and conventional health and safety, including: workforce resilience, emergency arrangements resilience, supply chain resilience, fire safety, events on the site and activities taking place on the site. No significant issues were highlighted to ONR.

We are keeping our engagements with Trawsfynydd under review and are alert to the need to balance completion of planned inspections with Welsh Government and local area COVID-19 rules. This includes undertaking some interactions by videoconference, email, and telephone (as appropriate) to optimise physical presence on the site.

Magnox Limited's (ML) Trawsfynydd End State Tactical Group (TESTG) provides updates to site stakeholders, including ONR, on the site's progress with decommissioning activities and planned journey to final end state. ONR attended two TESTG virtual meetings during this reporting period. These meetings discussed progress with fuel element debris (FED) retrievals, preparations for the planned ponds complex demolition and disposal (PCDD), Safestores (the Reactor buildings) height reduction (HR) and change in strategy to a rolling programme of decommissioning (RPD).

In December 2020, ONR received Trawsfynydd's planned periodic safety review (PSR) submission. The purpose of the PSR is to consider the extent to which a nuclear facility and its supporting safety case conform to relevant good practice, reflect the actual facility condition, and can be maintained over the period to the next review, including identifying any proportionate improvements. ONR has engaged with Trawsfynydd during this period, including specialist inspector visits to the site to support planned assessment activity, and is scheduled to make its decision on this PSR submission in December 2021.

Our nominated site safety inspector held two meetings in this reporting period with safety representatives at Trawsfynydd, to support their function of representing employees and receiving information on matters affecting their health, safety, and

welfare at work. No concerns were raised, and the safety representatives noted a positive working relationship with the site leadership team.

## 3 Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

There were no such safety matters or incidents of safety significance during the period.

## 4 Regulatory Activity

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

No LIs, Enforcement Notices or Enforcement letters were issued during this period.

Reports detailing regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

## 5 News from ONR

For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

### Enforcement action

- In April, we announced that EDF [complied](#) with a Direction we served on 14 December 2020, under the Pressure Systems Safety Regulations (2000). This followed an inspection, at which we found a number of pressure system components at Heysham 1 Power Station were overdue their scheduled examination.
- In May, we agreed to [extend an improvement notice](#) served on EDF in September 2020, recognising the progress made so far. The notice was served after some of the equipment used to measure reactor power at Heysham 2 was incorrectly configured. We judged that Heysham 2 is able to operate safely, and that additional time to demonstrate the required improvements will not pose a risk to safety. EDF must now comply with the improvement notice by 31 July 2021.

- In June, we announced that Rolls-Royce Submarines Ltd (RRSL) had [complied](#) with an improvement notice served on 29 May 2020. The notice was served after RRSL operators brought 21 units of fissile material into the facility – which exceeding the limit defined within the safety case and set out in the Criticality Control Certificate for the facility.
- In July, we served an improvement notice on Devonport Royal Dockyard Ltd (DRDL) for shortfalls in its health and safety arrangements. The notice was served after DRDL failed to demonstrate consistent and effective arrangements to control and monitor the risks associated with working at height at its Devonport site. DRDL must comply with the requirements of the improvement notice by 31 March 2022.
- In August, we announced that Morgan Sindall Infrastructure Ltd had complied with an improvement notice served in January 2021 after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Since this incident occurred, Morgan Sindall has put in place measures to prevent similar occurrences, and we are satisfied that they have complied with the requirements of the improvement notice.

### **COVID-19: ONR Position**

- We are continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities. We remain satisfied with industry's response at this time; there has been no significant change to dutyholders' safety and security resilience.
- We have measures in place to try and prevent asymptomatic ONR staff unwittingly conveying the virus onto a regulated site. We require all staff to take a circular 1 health (C1H) antigen test in advance of them visiting a site. In addition to the C1H test, we also require them to take a lateral flow test on the morning of their planned site visit. We are keeping our COVID-19 testing guidance under regular review, in-line with the changing national context and any further developments in industry approaches to testing arrangements.

### **Other**

- In April, we published an [article](#) introducing our newest board member, Jean Llewellyn, who joined us in October 2021, as security lead. Jean brings with her a wealth of experience, including serving as a non-executive director on the board of the World Institute for Nuclear Security since 2018 – which has given her a good understating of the global security challenges facing the nuclear industry.
- In May, we issued our e-bulletin '[ONR News](#)' to subscribers. This issue included farewell reflections from our outgoing chief executive, a leadership update, further information on our COVID -19 response, and the results of our latest stakeholder survey. You can sign up for our e-bulletin [here](#)

- On 1 June, we [announced](#) the full implementation of our new leadership structure. Mark Foy is now our combined Chief Executive and Chief Nuclear Inspector. He is supported by Sarah High as Deputy Chief Executive, and Donald Urquhart as Executive Director of Operations.
- In June, we published our new [Corporate Plan for 2021/22](#), which sets out our key priorities to protect the public by securing safe nuclear operations.
- In July, our project to become the UK's domestic safeguards regulator was named the public sector's [Project of the Year at the National Project Awards](#).

Nuclear safeguards are measures to verify that countries comply with international obligations not to use nuclear materials from civil nuclear programmes for non-peaceful purposes.

- In September we invited stakeholders to submit comments on our updated reference papers for Coastal Flood Hazards and Meteorological Hazards for Nuclear Sites. Although supplementary to our normal governance process, we are doing this due to stakeholder interest in these topics and our commitment to being an open and transparent regulator.

The reference papers provide additional detail on the analysis of the external hazards for nuclear sites and have been produced by our [Expert Panel on Natural Hazards](#), a group of academic and industry technical specialists working under contract to provide us with independent expert advice. You can find out more about how to get involved and comment on these papers on our [website](#).

## 6 Contacts

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